

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAPLAN, INC.

Plaintiff,

vs.

KENNETH CHOU, BENNY Y. CHANG,
JASON HANSON, DOES 2 through 20, AND
UNKNOWN ENTITY d/b/a, USMLEPRO,
USMLE TEST CENTER, INC. and SIMILAR
NAMES

Defendants.

Civil Action No: 1:07-cv-10677-HB
Honorable Harold Baer, Jr.
ECF Case

Trial by jury is demanded.

**FIRST AMENDED COMPLAINT FOR COPYRIGHT
AND TRADEMARK INFRINGEMENT**

Plaintiff, Kaplan, Inc. ("KAPLAN"), through its undersigned attorneys, alleges as follows:

NATURE OF THE ACTION

1. This is a civil action for copyright and trademark infringement under the United States Copyright Act, 17 U.S.C. §§ 101, et seq., the Federal Trademark Act, 15 U.S.C. §§ 1114, 1121, and 1125, and related state statutory and common law provisions. Plaintiff KAPLAN brings this action to prevent the Defendants' continued, systematic, unauthorized copying and commercial distribution of KAPLAN's copyrighted works, their use of KAPLAN's trademarks and for damages for such activity. Defendants' actions were and are willful, and substantially damage one of KAPLAN's core businesses, preparing medical school graduates for

medical licensing exams through in person and online instructional services and the related distribution of test preparation materials (printed and electronic).

2. In unlawfully copying Plaintiff's copyrighted works and selling such copies in competition with Plaintiff's services and using Kaplan's trademarks, Defendants have caused significant harm to KAPLAN and have earned large and unjust profits for themselves. Though Defendants have used the Internet to maintain some degree of anonymity, investigation has identified three individuals and one possible entity responsible, and discovery will reveal the others. Plaintiff seeks all remedies afforded by law, including statutory damages, or actual damages and Defendants' profits, enhanced damages, an accounting, an injunction and an award of costs including legal fees.

3. This First Amended Complaint, filed before any Defendant has responded to the original complaint, identifies Doe 1 as Kenneth Chou and removes one of the originally named defendants, based on information provided to Plaintiff after this action was commenced. It also adds a claim for trademark and similar infringement. No other changes are made. Defendant Benny Y. Chang, after receipt of the original complaint, has made informal representations denying culpable involvement by him, which Plaintiff presently is investigating. If those representations are confirmed, Plaintiff contemplates an additional amendment substantially modifying or removing the allegations made herein as to Benny Y. Chang.

JURISDICTION AND VENUE

4. This is a civil action seeking monetary and injunctive relief for copyright and trademark infringement under the copyright and trademark laws of the United States and under similar state statutory and common law.

5. This Court has jurisdiction under 15 U.S.C. § 1121; 17 U.S.C. § 101 et seq.; 28 U.S.C. §§ 1331 (federal question), 1338(a) (copyright and trademark); and 1367 (supplemental).

6. Venue in this District is proper. See 28 U.S.C. §§ 1391(b), 1400(a). Plaintiff is located here, its copyrights and trademarks (the property in issue) are held at its offices here, and the damages caused by Defendants have their impact here. Moreover, Defendants have offered infringing copies of Plaintiff's works to persons in this District. On information and belief, Defendants have sold and delivered infringing copies of Plaintiff's digital video discs (DVDs) to purchasers in this district knowing and intending that those purchasers view the DVDs in this District, which has occurred.

7. Personal jurisdiction exists in this District. Defendants have intentionally, regularly, and systematically engaged in business contacts with this District through their highly interactive websites and sale of infringing goods to individuals in the District. Defendants have caused unlawful damage and injury here, and the claims asserted herein relate to and arise from such intentional forum contacts.

PARTIES

8. Plaintiff KAPLAN is a corporation duly organized and existing under the laws of the State of Delaware with its principal place of business in New York, New York.

9. KAPLAN is a world leader in the provision of educational services, and for more than seventy years, has developed, marketed and sold educational programs that assist students and others in preparing for a variety of entrance tests and licensing examinations. Through its Kaplan Medical operating division, KAPLAN provides instruction and test preparation materials to medical students and doctors to help them prepare for a series of exams

known as the United States Medical Licensing Exam (USMLE). Kaplan instruction and course materials are designed to help students pass the USMLE Step 1 Exam (Basic Medical Sciences), the USMLE Step 2 CK Exam (Clinical Knowledge), the USMLE Step 2 CS Exam (Clinical Skills/Doctor-Patient Communication), and the USMLE Step 3 Exam (Patient Management Skills). For many years, KAPLAN has continuously advertised, marketed, offered and sold a wide variety of educational services, including, but not limited to the foregoing services, in connection with the inherently distinctive KAPLAN trademark throughout the United States, including in this District. The KAPLAN mark has been registered with the United States Patent and Trademark Office. See, *e.g.*, registration numbers 1,822,683 (no longer contestable), 2,145,904 (no longer contestable), and 3,366,941 (registered January 8, 2008). Plaintiff's KAPLAN trademark has acquired significant goodwill and a strong secondary meaning identifying KAPLAN and its unequalled curriculum and methods. The KAPLAN mark has become famous among consumers throughout the United States.

10. KAPLAN and its agents have invested substantial resources, expertise and creativity in developing, refining and marketing the Kaplan Medical USMLE course and test preparation materials and lectures and the distinctive marks used in association with them. KAPLAN's potential market for recouping this investment is limited, namely, to medical students and graduates seeking U.S. medical licenses. Thus, the copying, distribution and sale of KAPLAN's works, which are restricted for use only in connection with KAPLAN's in person courses, can quickly undercut its business.

11. Defendant Benny Y. Chang ("CHANG") is an individual residing in the state of California. Defendant Jason Hanson ("HANSON") is an individual residing in the state of California. Defendant Kenneth Chou ("CHOU") is an individual residing in the state of

California, who also maintains a residence in New York. He formerly was named as Doe Defendant 1. The true names and addresses of the Doe Defendants 2-20 are unknown to Plaintiff at this time.

12. On information and belief, CHANG, HANSON, CHOU and one or more Doe Defendants have formed and associated with a Defendant Entity that does business under the names USMLEPRO.COM, USMLEPRO.NET, USMLETESTCENTER.COM, USMLE TEST CENTER, INC., USMLE DVDCENTER, and AUDIO PRO, among other names, and using the website address www.usmlepro.net (See Exhibit A hereto) and the website address www.usmledvdcenter.com (See Exhibit B hereto), among other marketing vehicles. In the alternative, the names just listed are pseudonyms under which, on information and belief, CHANG, HANSON, CHOU and the Doe Defendants conduct business operations over the Internet. In either event, all of the Defendants are knowingly associated in the unlawful conduct alleged herein; each has caused, induced, encouraged, facilitated, and agreed to the infringing acts of the others; acted as agent of the others; knowingly benefited from the infringing acts of the others; and is responsible and liable for all such infringing acts, as direct infringers, vicarious infringers, and/or contributory infringers.

13. Plaintiff believes that the true identities of the Doe Defendants and the identity and form of the Defendant Entity will be obtained through future discovery and will promptly amend this complaint when their identities have been ascertained.

14. On information and belief, each Defendant, individually and collectively, has engaged in an ongoing and interrelated course of conduct, i.e., violation of copyright and trademark laws by the unauthorized reproduction, advertising, sale and distribution through sales made on the Internet of Plaintiff's USMLE test preparation written materials and DVD's.

Accordingly, Plaintiff's right to relief arises out of the same series of transactions or occurrences and there are questions of law or fact common to all Defendants such that joinder is appropriate.

GENERAL ALLEGATIONS

15. KAPLAN is, and at all relevant times has been, the exclusive owner of all copyrights under Title 17 of the United States Code in certain original works of authorship, to wit, various printed and electronic USMLE test preparation course and study materials, including, among others, Kaplan USMLE Step 1 Review, Volume 1 (General Principles Book 1); Kaplan USMLE Step 1 Review, Volume 2 (General Principles Book 2); Kaplan USMLE Step 1 Review, Volume 3 (Organ Systems Book 1); Kaplan USMLE Step 1 Review, Volume 4 (Organ Systems Book 2); Kaplan USMLE Step 1 Lecture Notes, Volume 1; Kaplan USMLE Step 1 Lecture Notes, Volume 2; Kaplan USMLE Step 1 Lecture Notes, Volume 3; and Kaplan USMLE Step 1 Q Book, as well as numerous recorded lectures viewable by students in Kaplan exam preparation courses (collectively, the "Copyrighted Materials") at KAPLAN's 160 teaching facilities (the "Kaplan Centers") located around the United States.

16. The Copyrighted Materials are distributed by KAPLAN only to individuals who have registered for KAPLAN's USMLE test preparation courses. The recorded lectures are only provided to students at Kaplan Centers or authorized locations for use and review at the facility only, and students are prohibited from making copies of or leaving those facilities with these recordings. KAPLAN Copyrighted Materials are covered by certificates of copyright registration. (See listing in Exhibit C hereto). In addition, KAPLAN intends to apply for additional certificates of copyright registration, including for the 2007 editions of the Copyrighted Materials and applications for certificates of registration for additional original works of KAPLAN in which copyright subsists.

17. Among the exclusive rights granted to KAPLAN by the Copyright Act are the exclusive rights to reproduce the Copyrighted Materials and to distribute the Copyrighted materials to the public. Neither KAPLAN nor any authorized agent of KAPLAN has given any right or license to any Defendant with respect to any of KAPLAN's Copyrighted Materials.

18. Pursuant to 17 U.S.C. §401, KAPLAN has placed notices of copyright on all distributed volumes or packages of the Copyrighted Materials. Moreover, by their nature, these are valuable materials in which one would expect copyright to be claimed.

19. On information and belief, each Defendant, without authorization, has reproduced, advertised, sold and distributed and continues to reproduce, advertise, sell and distribute illegal and unauthorized copies of the Copyrighted Materials to the general public. On information and belief, each Defendant unlawfully gained possession of copies of KAPLAN recorded lectures that are only available at Kaplan Centers to KAPLAN's students that are among the Copyrighted Materials and has reproduced, advertised, sold and distributed and continues to reproduce, advertise, sell and distribute illegal and unauthorized copies of those Copyrighted Materials to the general public. Specifically, among other activities, Defendants have offered the Copyrighted Materials on the Ebay online auction site, www.ebay.com, and on the Web sites www.usmlepro.com, usmlepro.net and/or www.usmledvdcenter.com, among others. Defendants' activities are undertaken with the purpose of making a profit.

20. Plaintiff has adopted and used in interstate commerce in connection with the activities and items described above distinctive marks ("Trademarks"), including registration numbers 1,822,683; 2,145,904; and 3,366,941. These Trademarks are protected by federal and state law. Defendants have used these Trademarks, without KAPLAN's permission, in promoting, offering for sale, and selling the infringing KAPLAN materials. These infringing

uses have occurred on Defendants' websites, their Internet communications, on the infringing materials they have sold, and otherwise.

21. On information and belief, Defendants have delivered infringing copies to purchasers in this District and elsewhere across the United States. In the case of Copyrighted Materials in electronic media, Defendants' delivery was for the foreseeable and intended purpose of loading a DVD into computer memory and displaying the works for use.

FIRST CLAIM FOR RELIEF

(Infringement of Copyright)

22. Plaintiff incorporates by reference paragraphs 1 through 21 of this Complaint as if set forth in full herein.

23. Defendants' copying, sale and distribution of the Copyrighted Materials to the general public directly infringes Plaintiff's copyrights therein in violation of 17 U.S.C. §501, et seq. Each Defendant also is liable for the further infringements that occurred when materials it sold and delivered were used as Defendants induced, intended and encouraged. Each Defendant also is liable as a vicarious or contributory infringer.

24. The foregoing acts of infringement have been willful, intentional, and in reckless disregard of and indifferent to the rights of Plaintiff.

25. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff substantial and irreparable injury that cannot fully be compensated or measured in monetary damages. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §502 and 503, Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing Plaintiff's copyrights. Plaintiff is entitled to injunctive relief requiring each Defendant to destroy all copies of the Copyrighted Materials made in violation of

Plaintiff's exclusive rights. Plaintiff is further entitled to an immediate order directing the seizure and destruction of all infringing articles in Defendants' possession or control, including the seizure of all computer hard drives, or other electronic storage media, on which any unauthorized copies of all Copyrighted Materials are stored or retrievable.

26. At any time before final judgment, Plaintiff is entitled to elect to receive statutory damages in lieu of actual damages and profits. 17 U.S.C. §504(c). For willful copyright infringement, the jury may award up to \$150,000 for each infringed work of Plaintiff's Copyrighted Materials. Defendants' infringement of each work was willful. The precise number of infringed works will be determined during discovery.

27. Plaintiff alternatively may choose to recover Defendants' profits attributable to infringement plus Plaintiff's actual damages. 17 U.S.C. §504(a). The statute provides that "[i]n establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenues, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work." 17 U.S.C. §504(b). Defendants' gross revenues over the period of the infringement are not known at this time, but will be determined during discovery.

28. Plaintiff also is entitled to enhanced damages, including its attorneys' fees and costs, pursuant to 17 U.S.C. §505, given that the actions of Defendants were willful, egregious, and intentional.

SECOND CLAIM FOR RELIEF

(Infringement of Trademark and Related Rights)

29. Plaintiff incorporates by reference paragraphs 1 through 28 as if set forth in full herein.

30. Plaintiff has the sole and exclusive right to use the Trademarks alleged above in connection with the activities and items described above and related activities. Plaintiff's rights are established by the Lanham Act, 15 U.S.C. §§ 1114 (trademark) & 1125 (unfair competition and false designation of origin), and by applicable state statutes and common law forbidding similar conduct, including unfair competition, false advertising, and unfair business practices.

31. Defendants' uses of Plaintiff's Trademarks are likely to deceive the public into believing falsely that they are dealing with Plaintiff and that the goods offered for sale and sold are authorized by Plaintiff and carry its assurances of quality, to the detriment of the public and to the irreparable injury of Plaintiff's trade and goodwill. On information and belief, the public has been so deceived.

32. Defendants' uses of the Trademarks have damaged and injured Plaintiff, and Defendants have unjustly profited in amounts not yet known but believed to be substantial. On information and belief, Plaintiff has lost potential customers to Defendants' infringing activities.

33. Defendants have acted with actual knowledge of Plaintiff's rights and with willful disregard of those rights for the purpose of deceiving the public, competing unfairly with Plaintiff, and reaping unearned and unjust returns.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment in favor and against each Defendant as follows:

1. For an injunction preliminarily or permanently enjoining the Defendants:
 - (a) From directly or indirectly infringing Plaintiff's rights under law in the Copyrighted Materials and the Trademarks, and any other copyrighted or trademarked medical

exam study materials, whether now in existence or later created, that are owned or controlled by Plaintiff or any parent, subsidiary, or affiliate of Plaintiff ("Plaintiff's Materials"), including without limitation by using the Internet to advertise, copy, sell, and/or distribute any of Plaintiff's Materials, except pursuant to a lawful license or with the express consent and authority of Plaintiff.

(b) To deliver to Plaintiff, or representatives of Plaintiff, for destruction, all tangible copies, electronically stored copies and electronic storage media containing the Plaintiff's Copyrighted Materials or bearing Plaintiff's Trademarks that Defendants have in their possession, custody or control.

2. For a money judgment, jointly and severally against each Defendant.

(a) For Plaintiff's actual damages for infringement, and, after an accounting, for profits attributable to the infringement.

(b) At Plaintiff's election prior to the entry of final judgment in this case, and as an alternative to actual copyright damages and profits, an award of statutory damages as permitted by the Copyright Act, for each of Plaintiff's timely requested works infringed, including enhanced statutory damages of \$150,000 per work for each of these works willfully infringed and timely registered.

(c) Enhanced damages because of Plaintiff's intentional and willful infringement and disregard of Plaintiff's trademark and similar rights.

(d) For the purpose of fair notice in the event one or more Defendants defaults, Plaintiff seeks such sum as is just up to \$100,000,000.

(e) For an award of punitive damages to the extent permitted by law;

(f) For an award of pre-judgment and post-judgment interest.

3. For Plaintiff's costs of this action, including Plaintiff's reasonable attorneys fees incurred in this action; and


4. For such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury.

Respectfully submitted,

By: _____



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Dated: March 4, 2008

Civil Action No: 1:07-cv-10677-HB

FIRST AMENDED COMPLAINT EXHIBIT

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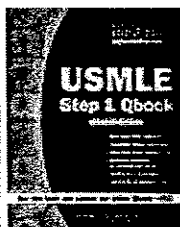
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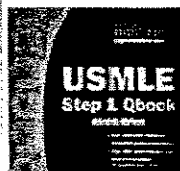
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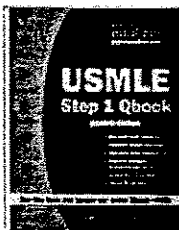
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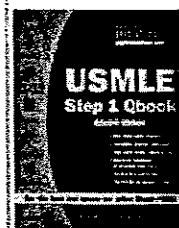


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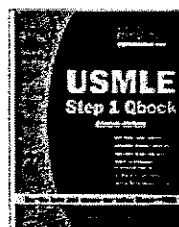
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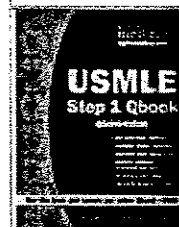


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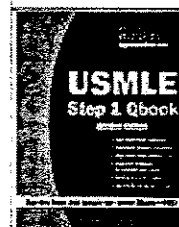
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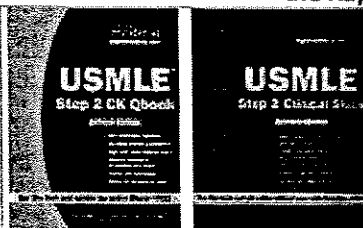
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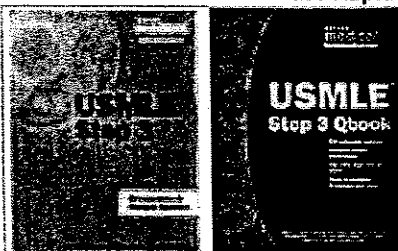
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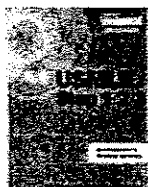
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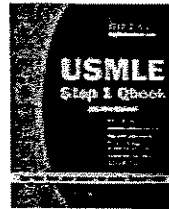
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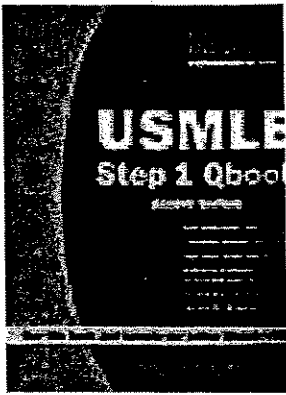
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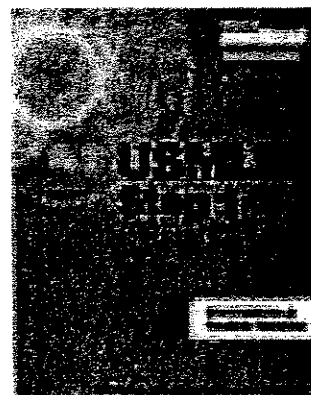
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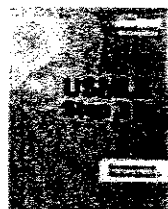


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AFFIRMATION OF SERVICE

I, Thomas W. Kirby, certify under penalty of perjury that no Defendant has yet appeared in this action. A copy of the attached First Amended Complaint (with its exhibits) has been mailed this date by first class mail, postage prepaid, to the following on behalf of two persons named as Defendants in the original Complaint whom Plaintiff has contacted:

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Irvine, CA 92614

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Thomas W. Kirby

March 4, 2008